

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p style="text-align: center;">as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>, Debtors.¹</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS (Jointly Administered)</p> <p>Re ECF Nos.: 12569, 12570, 12578, 12964, 13251</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p style="text-align: center;">as representative of</p> <p>PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,</p> <p style="text-align: center;">Debtor.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3567-LTS</p>
<p>THE COMMONWEALTH OF PUERTO RICO and PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,</p> <p style="text-align: center;">Movants,</p> <p style="text-align: center;">-v-</p> <p>AMBAC ASSURANCE CORPORATION,</p> <p style="text-align: center;">Respondent.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS (Jointly Administered)</p>

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**JOINT INFORMATIVE MOTION REGARDING JUNE 3, 2020 HEARING
ON MOTION OF THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD PURSUANT TO BANKRUPTCY CODE SECTIONS 105(A) AND 362
FOR ORDER DIRECTING AMBAC TO WITHDRAW COMPLAINT**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA,” and collectively with the Commonwealth, the “Debtors”), as Title III debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), Autopistas Metropolitanas de Puerto Rico (“Metropistas”), and Ambac Assurance Corporation (“Ambac,” and together with the Debtors, the Oversight Board, and Metropistas, the “Parties”) respectfully submit this joint informative motion pursuant to the Court’s *Order Regarding Procedures for June 3–4, 2020, Omnibus Hearing* [Case No. 17-3283, ECF No. 12721] (the “Procedures Order”) and respectfully state as follows:

1. The Parties will appear telephonically at the June 3, 2020 hearing on the *Motion of the Financial Oversight and Management Board Pursuant to Bankruptcy Code Sections 105(a) and 362 for Order Directing Ambac to Withdraw Complaint* [Case No. 17-3283, ECF No. 12569, Case No. 17-3567, ECF No. 756] (the “Motion”) as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. The following individuals may appear and speak on behalf of the Parties:

- a. Oversight Board: Michael A. Firestein and Ehud Barak of Proskauer Rose LLP
- b. Metropistas: Keith Martorana of Gibson, Dunn & Crutcher LLP
- c. Ambac: Andrew K. Glenn of Kasowitz Benson Torres LLP

3. The Parties understand the Court has allocated 45 minutes for a hearing on the Motion. The Parties have agreed to allocate such time as follows, listed in the order in which the Parties shall present:

- a. Supporting Parties' Opening Argument: 14 minutes
 - i. Oversight Board: 14 minutes
- b. Objecting Parties' Argument: 22.5 minutes
 - i. Ambac: 22.5 minutes
- c. Supporting Parties' Rebuttal Argument: 8.5 minutes
 - i. Metropistas: 3.5 minutes
 - ii. Oversight Board: 5 minutes

WHEREFORE, the Parties respectfully request that the Court take notice of the above.

Dated: May 31, 2020.
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
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